

13 Nov 1997

From: Captain of the Port Houston-Galveston
To: Distribution

Subj: REQUIREMENTS FOR OVER THE TOP LIQUID CARGO TRANSFERS

The Code of Federal Regulations (CFR), specifically forbids tank vessels to load cargo through tank ullages utilizing temporary connections and/or hoses. Title 33 CFR 156.120(g) requires that the transfer system be attached to a fixed connection on the vessel and the facility. Title 46 CFR 35.35--20k(d) requires all cargo connections be made to the vessel's pipeline. The terms "fixed connection" and "pipeline" refer to the fixed cargo piping system installed on the vessel.

Should exigent circumstances warrant a deviation from the above regulations, a written request for an "over the top" transfer must be submitted to this office for approval. This request must outline transfer procedures, identify equipment to be used, address safety issues and contain an MSDS for the product. Any temporary systems or alternatives requested under Title 33 CFR 156.107 must be constructed to meet applicable equipment standards, including current International Safety Guide for oil Tankers and Terminals (ISGOTT) standards, and be approved by the Captain of the Port.

At a minimum, your request must specifically address the following:

- type of pump (s) to be used
- compatibility of the pump with the product
- the pump must be properly electrically bonded to the vessel hull
- identify the types of hoses to be used and ensure they are in compliance with the specifications of 33 CFR 154.500
- any open hatches must be properly sealed for IGS retention or protected by an adequate flame screen
- piping connections and path of cargo movements (cargo must be transferred from the portable pump into the vessels fixed cargo manifold system if at all possible)
- a pre-transfer conference must be completed prior to the transfer with all involved personnel

If your request for an over the top transfer is approved you must notify this office no later than two hours prior to the transfer. A Coast Guard assessment team may be sent to monitor the critical portions of the transfer to ensure that your proposed safety measures have been taken.

For further information regarding this policy, contact the Captain of the Port Houston-Galveston at (713) 671-5111 or the Marine Safety Unit Galveston at (409) 766-3 715

K J. ELDRIDGE
Captain, U. S. Coast Guard
Captain of the Port